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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO MOTIONS TO QUASH
AND EXHIBITS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
7 to File Under Seal Portions of Its Opposition to Motions to Quash and Exhibits (the “Administrative
8 Motion”). The Administrative Motion seeks an order sealing highlighted portions of Otto Trucking’s
9 Letter Brief re Opposition to Motion to Quash (“Otto Trucking’s Opposition”) and of Exhibits 3 and
10 12 to the Declaration of Hayes Hyde, as well as the entirety of Exhibits 4-11 and 13-14.

11 3. Otto Trucking’s Opposition (green highlighted portions in version filed herewith),
12 Exhibits 3 and 6-10 (green highlighted portions in version filed herewith), and Exhibit 12 (red
13 highlighted portions), and the entirety of Exhibits 5 and 14 contain, reference, and/or describe
14 Waymo’s highly confidential and sensitive business information. Such information includes details
15 regarding Waymo’s security measures and protocols, the scope of forensic investigations conducted,
16 and detailed computer forensics regarding access to Waymo’s trade secrets. I understand that Waymo
17 maintains this information as confidential. The public disclosure of this information would cause
18 significant competitive harm to Waymo, as its security measures and computer forensics methods
19 would become known to competitors who could use such information to Waymo’s disadvantage.

20 4. Exhibit 8 and 10 (portions highlighted in green in version filed herewith) additionally
21 contain, reference, and/or describe Waymo’s confidential technical information. The information
22 Waymo seeks to seal includes the confidential design and functionality of Waymo’s proprietary
23 autonomous vehicle system, which Waymo maintains as secret. I understand that these designs are
24 maintained as secret by Waymo (Dkt. 25-47) and that the designs are valuable to Waymo’s business
25 (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors access to
26 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
27 information were made public, I understand that Waymo’s competitive standing would be
28 significantly harmed.

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven